

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
GREGORY ELEFTERAKIS, ROMAN POLLAK,  
ANTHONY BRIDDA, NICHOLAS ELEFTERAKIS,  
NICHOLAS LIAKIS, and IME COMPANIONS LLC,

Defendants.

-----X  
SAFA GELARDI and IME COMPANIONS, LLC,

Third-Party Plaintiffs,

-against-

CARLOS ROA,

Third-Party Defendant.

-----X  
CARLOS ROA,

Third-Party Counter-Claimant,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
and IME COMPANIONS, LLC,

Third-Party Counter-Defendants.

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SAFA A. GELARDI, hereby declares and verifies the truth of the following, under  
penalty of perjury under the laws of the United States of America, pursuant to Title 28, United States  
Code, Section 1746:

Case No.: 1:22-cv-1032 (PKC)(JRC)

**DECLARATION OF  
SAFA A. GELARDI**

1. I am a defendant in the above-captioned matter and the Chief Executive Officer of defendant IME Companions LLC (“IME Companions”), and I am fully familiar with the facts set forth herein. I make this declaration in opposition to the motion of plaintiff IME Watchdog, Inc., for an Order: (a) finding Defendants in civil and criminal contempt; (b) precluding Defendants from selling their Staten Island property and any other real property owned with the State of New York; (c) requiring Defendants to take down a Facebook post disparaging plaintiff’s principal in violation of the First Amended Injunction; and (d) issuing appropriate sanctions.

2. I categorically deny Plaintiff’s unsupported allegations of wrongdoing. Defendants have not serviced any customers on the Enjoined Customers List in violation of any Order. Defendants are not continuing to conduct business as “IME Legal Reps” after “migrating” our IME Companions website to a new domain name. To the contrary, my husband and I sold the website domain to a third-party by sale agreement dated April 10, 2013. The sale agreement is attached as Exhibit “B” to my attorney’s letter brief.

3. The website for IME Legal Reps does not bear the name IME Companions throughout the website; does not list as its customers law firms contained on the Enjoined Customer List; and does not include my biography. Print-outs from the website for IME Legal Reps are attached as Exhibit “A” to my attorney’s letter brief.

4. We sold the website after shutting down IME Companions in response to this Court’s decision to expand the amended preliminary injunction to preclude IME Companions from servicing nearly all of its clients, simply because they had once allegedly been plaintiff’s clients.

5. Defendants do not have any connection to or financial interest in IME Legal Reps. Nor do we have any connection to or financial interest in IME Management & Consulting LLC. Defendants are presently out of the business.

6. As for the Facebook post complained about by plaintiff such post has been taken down. The post has been taken down although it did not in any way refer or allude to either Daniella Levi or Carlos Roa and, as such, did not violate any Court Order.

7. My husband and I have not assigned, disposed, encumbered or secreted any property in an effort to defraud any creditors or to frustrate the enforcement of any judgment plaintiff might obtain.

8. Nor are my husband and I attempting to engage in any fraud by selling any real property. We have placed our holdings on the market because we need money to defend this litigation and to make up for the loss of income we have suffered as a result of the recent expansion of the amended preliminary injunction which put us out of business. We intend to sell at the highest price possible in arm's-lengths transactions, and we have placed multiple properties on the market at the same time to see which property we can sell first at the highest rate of return. We are not selling any property to defraud anyone. We are trying to sell so we can meet our living expenses, pay our attorneys and pay the forensic analyst.

I declare under penalty of perjury that the foregoing is true and correct. Executed on

April 27, 2023.

  
Safa A. Gelardi

Sworn to before me this  
27<sup>th</sup> day of April, 2023

  
NOTARY PUBLIC

SHEILA C GURRIERI  
NOTARY PUBLIC, STATE OF NEW YORK  
NO. 01GU4885711  
QUALIFIED IN RICHMOND COUNTY  
MY COMMISSION EXPIRES 02-17-23